

THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
Ebonie Croxton	:	Chapter 7
	:	
Debtor	:	Case No.: 20-14389-elf

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**MOTION FOR RELIEF FROM THE AUTOMATIC STAY**  
**PURSUANT TO 11 U.S.C §362**

Monica Brown, of The London Star Group, LLC hereby moves this Court, pursuant to 11 U.S.C. § 362, for relief from the Automatic Stay provided under Section 362(a) to allow Eviction proceedings to continue against the Debtor in the Philadelphia Municipal Court:

1. Ebonie Croxton “Debtor,” filed a petition under Chapter 7 Bankruptcy on or about November 7, 2020.
2. The Bankruptcy case was assigned case number 20-14389.
3. The subject Bankruptcy lists the Movant, Monica Brown as a creditor on Schedule “F,” however the amount of debt listed as \$5,015.00 is inaccurate.
4. On or about March 10, 2020 the Movant filed a Landlord-Tenant Complaint in the Philadelphia Municipal Court, the Landlord Tenant matter was assigned case number 20-03-10-4143.
5. The Landlord Tenant matter has been continued several times related to Covid and most recently continued in light of the instant Chapter 7 Bankruptcy matter.
6. The Debtor has not paid rent for the premises known as 6545 North Bouvier Street, Philadelphia, Pennsylvania, 19126 since in or about November, 2019.

7. In accordance with the Tenant Notice dated August 8, 2020, at the time of the Notice, the Debtor was delinquent in the total sum of \$11,503.81. A true and correct copy of the Tenant Notice is attached hereto and labelled as Exhibit "A."
8. Per the Debtor's schedules, specifically Schedules I and J, sufficient income does not exist to pay to pay the Movant on a regular and monthly basis.
9. Movant Requests that the Court waive Rule 4001(a)(3), permitting Movant to immediately implement and enforce the Court's Order.
10. In light of the above circumstances, it is respectfully requested that an Order be entered granting Relief from the Automatic Stay, in order to allow the Landlord-Tenant Municipal Court action to proceed.

**WHEREFORE**, Movant, respectfully request that the Court enter an Order: (i) Granting this Motion and (ii) Granting the Movant such other and further relief to which they may be justly entitled.

Dated: December 4, 2020

/s/Brad J. Sadek, Esq

Attorney for Movant  
Sadek and Cooper, LLC.  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
215-545-0008